

# **Exhibit 1**

**From:** [Geoffrey L. Harrison](#)  
**To:** [Agnieszka M. Fryszman](#); [Paul Hoffman](#); [Nicholas Jacques](#)  
**Cc:** [Jeff McLaren](#); [Michael Brightman](#); [Rick Hess](#)  
**Subject:** [EXTERNAL] RE: KBR A2 DCO filing  
**Date:** Tuesday, January 25, 2022 11:44:39 AM

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No need for another exchange. If ps have any proofing or other changes then pls email to me in word by 1p ct and we'll drop it in and then file with this intro. Thanks.

Parties' Joint Submission Regarding Proposed Schedules

The parties met and conferred multiple times by phone, Zoom, and email, but have not been able to agree on a schedule. Part I (and Exhibit 1) of this joint filing presents KBR's proposed schedule and supporting argument. Part II (and Exhibit 2) presents plaintiffs' proposed schedule and supporting argument. The parties would welcome a status conference if useful to the Court.

*Geoffrey L. Harrison*  
*(713) 498-2425 - Cell*  
[Click for web bio](#)

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**From:** Agnieszka M. Fryszman <AFryszman@cohenmilstein.com>  
**Sent:** Tuesday, January 25, 2022 9:20 AM  
**To:** Geoffrey L. Harrison <gharrison@susmangodfrey.com>; Paul Hoffman <hoffpaul@aol.com>; Nicholas Jacques <NJacques@cohenmilstein.com>  
**Cc:** Jeff McLaren <JMcLAREN@SusmanGodfrey.com>; Michael Brightman <MBrightman@susmangodfrey.com>; Rick Hess <rhess@SusmanGodfrey.com>  
**Subject:** RE: KBR A2 DCO filing

EXTERNAL Email

We don't have changes beyond general proofing/clean up so happy to file if that is easier. Should we both exchange pdfs of our sections at 1pm so we have a mutual final exchange?

We will need to file a cover memo of some kind, how about something like this:

The parties met and conferred on a schedule and docket control order but were unable to reach agreement. The parties agreed to make a joint submission of their separate proposals, along with 5 pages in support of their respective proposals. The parties exchanged their proposals and KBR [or CMST] agreed to file both proposals on behalf of the parties. Attached at tab 1 is Plaintiffs' proposal. Attached at tab 2 is Defendants' proposal. [ or vice versa]

LMK.

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